

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

LARRY PIONE,

Plaintiff,

V.

MASSACHUSETTS PORT  
AUTHORITY,

Defendant.

C.A. No. 04-12177-MLW

**DEFENDANT MASSACHUSETTS PORT AUTHORITY'S,  
CERTIFICATION PURSUANT TO LOCAL RULE 16.1**

The undersigned, counsel to the defendant and an authorized representative of the defendant, affirm that they conferred as to the establishment of a budget for the costs of conducting litigation and its alternatives. The undersigned also affirm that they have conferred as to the resolution of this litigation through the use of alternative dispute resolution.

## Counsel to the Defendant

/s/ William V. Hoch

Defendant's Authorized Representative,

/s/ David Mackey

William V. Hoch, Esq.  
BBO #564465  
Senior Employment Counsel  
Massachusetts Port Authority  
One Harborside Drive - Legal  
East Boston, Massachusetts 02128  
(617) 568-3142

David Mackey  
Chief Legal Counsel  
Massachusetts Port Authority  
One Harborside Drive - Legal  
East Boston, Massachusetts 02128  
(617) 568-3140

Date: 9/16/05

Date: 9/16/05

## Certificate of Service

I hereby certify that on this day                      a true copy of the above document was served upon the attorney of record for the plaintiff electronically and by hand on 9/19/05.

9/16/05

/s/ William V. Hoch

---

Date

---

---

William V. Hoch